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June 3, 2020

**VIA ECF**

Hon. Debra C. Freeman  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: *Katlyn Doe*, 1:19-cv-07771-PKC-DCF; *Priscilla Doe*, 1:19-cv-07772-ALC-DCF;  
*Lisa Doe*, 1:19-cv-07773 ER-DCF; *VE.*, 1:19-cv-07625-AJN-DCF;  
*Jane Doe*, 1:19-cv-08673-KPF-DCF; *Farmer*, 1:19-cv-10475-LGS-DCF;  
*Helm*, 1:19-cv-10476-PGG-DCF; *Bryant*, 1:19-cv-10479-ALC-DCF;  
*Jane Doe 1000*, 1:19-cv-10577-LGS-DCF; *Jane Doe 15*, 1:19-cv-10653-PAE-DCF;  
*Mary Doe*, 1:19-cv-10758-PAE-DCF; *Davies*, 1:19-cv-10788-GHW-DCF;  
*Anastasia Doe*, 1:19-cv-11869-AJN-DCF; *Jane Doe*, 1:20-cv-00484-JGK-DCF**

Dear Judge Freeman:

We represent Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, the "Co-Executors"), in the above-referenced actions. We are pleased to inform the Court that, today, the Superior Court of the United States Virgin Islands entered an order granting the Co-Executors' Motion to establish the Epstein Victims' Compensation Program. A copy of the Order is attached hereto.

Respectfully submitted,

/s/ Bennet J. Moskowitz  
Bennet J. Moskowitz

cc: Counsel of Record (via ECF)

# ATTACHMENT



**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN**

IN THE MATTER OF THE ESTATE OF:

**JEFFREY E. EPSTEIN,**

deceased.

**PROBATE NO. ST-19-PB-80**

**ACTION FOR TESTATE  
ADMINISTRATION**

**ORDER**

**THIS MATTER** is before the Court on the Co-Executors' Status Report on Voluntary Compensation Program and Presentation of Program Protocol filed on June 1, 2020, wherein, in pertinent part, the Co-Executor notify that all interested parties have finalized and are in support of the protocol for the Epstein Victims' Compensation Program (hereinafter "the Program").<sup>1</sup> The Court having received testimony concerning the Program at the hearing held on February 4, 2020, and having reviewed said Status Report, it is hereby

**ORDERED** that the *Expedited* Motion for Establishment of a Voluntary Claims Resolution Program filed on November 14, 2019, is **GRANTED**; and it is further

**ORDERED** that the Co-Executors are **AUTHORIZED** to commence the Epstein Victims' Compensation Program on or about June 15, 2020.

Dated: June 2, 2020

  
**CAROLYN P. HERMON-PERCELL**

Magistrate Judge of the Superior Court of the Virgin Islands

**ATTEST:**

**TAMARA CHARLES**

Clerk of the Court

By: 

**EDOTCIA THOMAS-HODGE**

Court Clerk Supervisor 6/3/2020

CERTIFIED A TRUE COPY

DATE 6/3/2020

TAMARA CHARLES  
CLERK OF THE COURT

BY 

COURT CLERK

<sup>1</sup>At the hearing held on February 4, 2020, while the Court did not allow the Attorney General of the U.S. Virgin Islands to intervene, the Court did request the Co-Executors and the Attorney General to resolve their differences concerning the proposed compensation program, which has garnered the support of all interested parties, including claimants' counsel. The Co-Executors now inform that "[b]ecause the need for the Program has grown increasingly urgent, and with the support of claimants' counsel and the USVI Attorney General – and because the remaining impediments have been resolved and the interested parties have consented to the Protocol," they and the Attorney General have reached an agreement in which the latter will promptly lift previously imposed liens to pay amounts owed for the Program and to begin funding the Program's active operations, including payment of compensation determinations to eligible claimants. Co-Executors' Status Report on Voluntary Compensation Program and Presentation of Program Protocol, at 6, June 1, 2020.